

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
 :
 Plaintiffs, :
 :
 v. : C.A. No. 05-823-*** (MPT)
 :
 STANLEY TAYLOR, et al., : JURY TRIAL REQUESTED
 :
 Defendants. :

PLAINTIFF GEORGE A. JACKSON'S MOTION FOR LEAVE REQUESTING
TO BE PRESENT AT ANY DEPOSITION THAT THE DEFENDANT'S TAKE
OF THE PLAINTIFFS

COME NOW, Plaintiff George A. Jackson, pro se, and respectfully moves this Court to enter an Order granting Plaintiff Jackson the right to be present at any deposition that the Defendants' take of the Plaintiffs, and states:

1. Plaintiff George A. Jackson ("Plaintiff Jackson") filed a letter/motion seeking a Court order directing Defendants to depose all twenty-five (25) Plaintiffs in this case. [D.I.221]

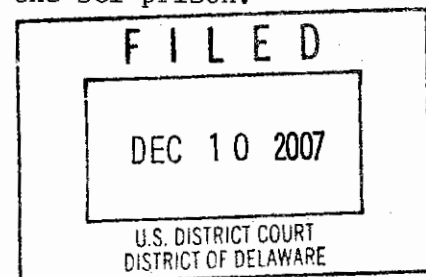
2. On November 28, 2007, Defendants opposed Plaintiff Jackson's letter/motion to the Court requesting to take deposition in their Response.

3. On November 28, 2007, Defendants' filed a Motion for leave to Depose Plaintiff(s) Carl Walker and Vernon Truitt under Fed. R. Civ. P. 30(a)(2) which requires leave of the Court to depose an incarcerated individual.

4. Plaintiffs Jackson, Walker and Truitt are inmates incarcerated at the Sussex Correctional Institution (SCI).

5. Plaintiff Walker and Truitt are presently working in the SCI main kitchen among Defendants Senato, Adkins, Melvin, Raynor, Crockett, white and Manuel.

6. The taking of the depostion will be here at the SCI prison.

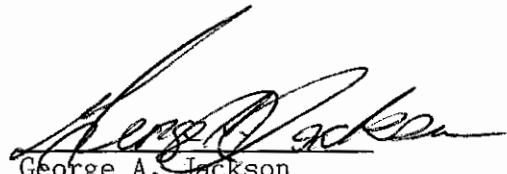


7. Plaintiff seek the right to be present at every deposition Defendants take of the Plaintiffs, including Carl Walker and Vernon Truitt.

8. Plaintiff Jackson is currently acting pro se, and Plaintiffs Walker and Truitt will be witnesses to the case if there is a trial. Parties to a case are generally permitted to be present at deposition if they wish.¹

9. Defendants will not be prejudice by this request of Plaintiff Jackson, since Plaintiffs Jackson, Walker and Truitt are incarcerated at the same prison.

WHEREFORE, Plaintiff Jackson respectfully request this Honorable Court to grant his Motion For Leave Requesting To Be Present At the Deposition of Plaintiffs Walker and Truitt.


George A. Jackson
SBI#00171250
Sussex Correctional Institution
P.O. Box 500
Georgetown, DE 19947

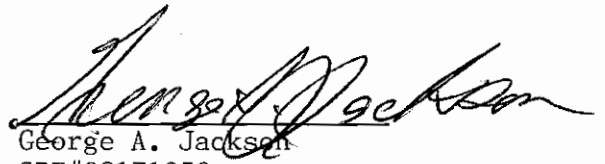
DATED 11/30/2007

¹Roger S Haydock and David F. Herr, Discovery Practice at § 3.2.2. (2d.ed., Little Brown & Co., 1988). As a practical matter, that would be required at the prison.

CERTIFICATE OF SERVICE

I hereby certify, that on November 30, 2007, I filed Plaintiff
George A. Jackson's Motion for Leave Requesting to Be Present
At Any Deposition That The Defendants' take of The Plaintiffs,
by placing said copy in the SCI prison mailbox to be forward to:

Catherine Damavandi
Deputy Attorney General
State of Delaware
Department of Justice
820 N. French Street, 6th Fl.
Wilmington, DE 19801


George A. Jackson
SBI#00171250
Sussex Correction Institution
P.O. Box 500
Georgetown, DE 19947

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